



## TENNESSEE WILDLIFE RESOURCES AGENCY

ELLINGTON AGRICULTURAL CENTER  
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December 12, 2005

Mike Johanns  
Secretary of Agriculture, Farm Bill  
1400 Independence Avenue, SW.  
Washington, DC 20250-3355

Dear Secretary Johanns:

Thank you for the opportunity to provide comment on behalf of the Tennessee Wildlife Resources Agency regarding the upcoming 2007 Farm Bill deliberations.

The Tennessee Wildlife Resources Agency recognizes the role of agriculture and the American farmer in not only providing food and fiber to meet our nation's needs, but also the role they play in managing much of our country's private land wisely to reduce impacts to soil erosion and water quality as well as providing habitat to sustain our wildlife populations. Federal farm policy and conservation programs greatly impact the ability of farmers to meet these varied important demands.

The following are our comments regarding policy question #3, "How can farm policy best achieve conservation and environmental goals?":

We feel these general guiding principles should be addressed by USDA farm policy:

1. In order for fish and wildlife habitat needs to be adequately met, the 2007 Farm Bill should retain the specific wording that maintains wildlife as a co-equal priority with soil erosion and water quality.
2. Conservation programs should be designed to mitigate effects of urban sprawl through incentives to keep farmland in production (strengthen the Farm and Ranchland Protection Program).
3. Conservation objectives should be designed to help achieve habitat objectives of various state, regional and national plans, such as the Northern Bobwhite Conservation Initiative, North American Waterfowl Plan, North American Landbird Conservation Plan, National Fish Habitat Initiative, and State Wildlife Action Plans.
4. The Forestry Title of the 2007 Farm Bill should be strengthened and improved, and should promote healthy forest ecosystems.
5. The 2007 Farm Bill should address global climate change in a meaningful way by designing conservation programs to include terrestrial carbon sequestration projects that provide benefits to carbon emission reductions and ecosystem benefits.

**The State of Tennessee**

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In addition to these guiding principles, here are other specific program or concept recommendations:

1. **Strengthen incentives for riparian buffers.** Streams are integral in supporting life for many threatened and endangered species, and adjacent riparian habitats also impact the water quality and temperature in streams as well as provide critical habitat for terrestrial wildlife. The 2007 Farm Bill should continue and improve its focus on protection and restoration of riparian habitats, both forested and herbaceous. While good incentives are currently present for many row crop farmers on CRP Continuous Signup practices such as CP21, CP22, and CP33, similar incentives should be expanded for hay and pasturelands either through options such as adjustments to practice eligibility on CP29 Marginal Pastureland Buffers and through additional signing incentives and increased cost-share in other programs such as EQIP.
2. **Retain CRP as a cornerstone conservation program, and improve program flexibility to improve regional wildlife priorities.** The CRP could be as effective in improving bobwhite populations in the Southeast as it has been for ducks and pheasants in the Great Plains.
  - Improve the coordination and funding between FSA and NRCS necessary to effectively implement CRP. In-house conflicts between these two agencies that dually implement the CRP and shortages of technical assistance dollars to NRCS to perform the required tasks to process and implement CRP applications significantly hamper the effective administration of this program and the ability of state wildlife agencies to assist in program promotion.
  - Retain and expand the Continuous CRP practices. The continuous nature of enrolling land in CCRP is convenient to farmers and spreads out workload for USDA employees. Maintain high enough incentive and annual payments to entice landowners to their least-productive and/or environmentally sensitive lands in these practices.
  - Eliminate/severely restrict the use of introduced plant species for conservation covers.
  - Maintain mid-contract management practices.
  - Adding additional payments to farmers (voluntary participation) to allow public access for recreation such as hunting, fishing, and birdwatching, could provide additional income to farmers while helping meet the growing recreational demand by the public. Such a program would likely be best carried out through a cooperative agreement with state wildlife agencies, and piloted at first in a few states.
3. **Incorporate a short-term contract, "flex fallow" type program, crafted to also address early successional wildlife needs.** Acreage set-asides, one of the measures being suggested to improve the country's response to fluctuating commodity stockpiles, can be used effectively to adjust crop production, protect our most environmentally sensitive farmlands, and provide critical wildlife habitat. We suggest a combination of long-term set-asides (e.g. current 10 to 15

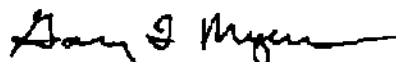
year CRP contracts) and a shorter (3 to 5 year) term program. Structured with proper guidelines, the short-term program could provide habitat lacking by many declining early successional wildlife species. Key components of a short-term set-aside program:

- Eliminate/severely restrict the use of introduced plant species for conservation covers.
- Allow temporary cover seedings to succeed into natural vegetative covers in regions of the country (e.g. such as the Southeast) where plant succession occurs quickly.
- If set-aside acreage is to be re-enrolled, require disturbance practices (e.g. CRP mid-contract management practices) to be applied either before or immediately after re-enrollment.

3. Either eliminate the Grassland Reserve Program, modify the program to focus on protection of native grasslands and/or combine with the Farm and Ranchland Program. The Grassland Reserve Program as it was implemented, did little in the Southeast other than to provide payments to farmers to continue haying and grazing as usual on introduced grasses such as fescue and bermudagrass, providing little or no additional environmental benefits. On top of that, payments for rental agreements were so modest as to likely not impact the protection of that land to development (e.g. an \$8-\$16 per acre payment with modest contract-breaking penalties does little to offset a developer offering a farmer \$10,000 or more per acre to sell their land).
4. Fully fund the CSP and make wildlife a mandatory third resource to be addressed. While the CSP concept is good, meager funding resulting in few CSP contracts and uncertain schedules of when watersheds will be eligible for CSP funding provide disincentives to "motivate the rest", contrary to the purpose of the program.

The Tennessee Wildlife Resources Agency welcomes opportunities to be involved in discussions and deliberations on crafting a 2007 Farm Bill that will effectively deliver conservation programs with multiple benefits that include our wildlife and fisheries resources. Thank you for your consideration of our comments.

Sincerely,



Gary T. Myers  
Executive Director

GTM:mg

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SECRETARIAL, USDA  
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ADDRESS CORRECTION REQUESTED

-From-

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TO

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